

Ashley M. Simonsen (State Bar. No. 275203)  
COVINGTON & BURLING LLP  
1999 Avenue of the Stars  
Los Angeles, CA 90067  
Telephone: + 1 (424) 332-4800  
Facsimile: +1 (650) 632-4800  
Email: asimonsen@cov.com

*Attorneys for Defendants Meta Platforms, Inc.;  
Instagram, LLC; Meta Payments, Inc.; and  
Meta Platforms Technologies, LLC*

*Additional parties and counsel listed on signature page*

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY PRODUCTS  
LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:

*People of the State of California, et al. v. Meta  
Platforms, Inc., et al.*

MDL No. 3047

Case Nos. 4:22-md-03047-YGR-PHK  
4:23-cv-05448-YGR

**JOINT STIPULATION OF DISMISSAL  
WITHOUT PREJUDICE**

Judge: Hon. Yvonne Gonzalez Rogers  
Magistrate Judge: Hon. Peter H. Kang

# JOINT STIPULATION OF DISMISSAL WITHOUT PREJUDICE

Plaintiff the State of Michigan *ex rel.* Dana Nessel, Attorney General of the State of Michigan (“Michigan AG”), and Defendants Meta Platforms, Inc., Instagram, LLC, Meta Payments, Inc. and Meta Platforms Technologies, LLC (“Defendants”), by and through their undersigned counsel, hereby stipulate to the dismissal of the Michigan AG’s complaint, without prejudice, in accordance with Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, with each party to bear their own costs and fees. The parties further stipulate that any and all subpoenas that Defendants served on the named Michigan agencies in connection with the Michigan AG’s claims in this action, including the following, are hereby withdrawn with immediate effect: (i) Michigan Department of Education, dated July 29, 2024; (ii) Michigan Department of Health & Human Services, dated July 29, 2024; (iii) Michigan Department of Lifelong Education, Advancement, and Potential, dated August 28, 2024 and November 19, 2024; (iv) Michigan Department of Labor and Economic Opportunity, dated November 19, 2024; (v) Executive Office of the Governor of Michigan, dated November 19, 2024; and (vi) Michigan State Budget Office, dated November 27, 2024; and all outstanding party discovery directed to the State of Michigan in connection with the Michigan AG’s claims in this action, including but not limited to discovery sought under Rules 30(b)(6) and 34, is hereby withdrawn with immediate effect.

Dated: January 28, 2025

Respectfully submitted,

**DANA NESSEL**

Attorney General

State of Michigan

/s/ Daniel J. Ping

Daniel J. Ping (P81482)

Assistant Attorney General

Michigan Department of Attorney General

Corporate Oversight Division

P.O. Box 30736

Lansing, MI 48909

517-335-7632

PingD@michigan.gov

*Attorneys for Plaintiff State of Michigan*

**COVINGTON & BURLING LLP**

/s/ Ashley M. Simonsen (with permission)

Ashley M. Simonsen (State Bar. No. 275203)

COVINGTON & BURLING LLP

1999 Avenue of the Stars

Los Angeles, CA 90067

Telephone: + 1 (424) 332-4800

Facsimile: +1 (650) 632-4800

Email: [asimonsen@cov.com](mailto:asimonsen@cov.com)

Phyllis A. Jones, *pro hac vice*

Paul W. Schmidt, *pro hac vice*

COVINGTON & BURLING LLP

One CityCenter

850 Tenth Street, NW

Washington, DC 20001-4956

Telephone: + 1 (202) 662-6000

Facsimile: + 1 (202) 662-6291

Email: [pajones@cov.com](mailto:pajones@cov.com)

Email: [pschmidt@cov.com](mailto:pschmidt@cov.com)

Emily Johnson Henn (State Bar. No. 269482)

COVINGTON & BURLING LLP

3000 El Camino Real

5 Palo Alto Square, 10th Floor

Palo Alto, CA 94306

Telephone: + 1 (650) 632-4700

Facsimile: +1 (650) 632-4800

Email: [ehenn@cov.com](mailto:ehenn@cov.com)

Isaac D. Chaput (State Bar No. 326923)

COVINGTON & BURLING LLP

Salesforce Tower

415 Mission Street, Suite 5400

San Francisco, CA 94105

Telephone: +1 (415) 591-6000

Facsimile: +1 (415) 591-6091

Email: [ichaput@cov.com](mailto:ichaput@cov.com)

Gregory L. Halperin, *pro hac vice*

COVINGTON & BURLING LLP

620 Eighth Avenue

New York, NY 10018-1405

Telephone: +1 (212) 841-1000

Facsimile: +1 (212) 841-1010

Email: [ghalperin@cov.com](mailto:ghalperin@cov.com)

*Attorneys for Defendants Meta Platforms, Inc.;  
Instagram, LLC; Meta Payments, Inc.; and  
Meta Platforms Technologies, LLC*

**ATTESTATION**

I, Daniel J. Ping, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: January 28, 2025

/s/ Daniel J. Ping  
Daniel J. Ping (P81482)  
Assistant Attorney General  
Michigan Department of Attorney General  
Corporate Oversight Division  
P.O. Box 30736  
Lansing, MI 48909  
517-335-7632  
PingD@michigan.gov